

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MARTIN J. WALSH, Secretary of Labor,
U.S. Department of Labor,

Plaintiff,

V.

**HALO HOMECARE SERVICES, LLC,
et al.,**

Defendants.

Case No. 1:20-cv-00744-MWM

Judge Matthew W. McFarland

**MEMORANDUM IN SUPPORT OF SECRETARY'S MOTION
FOR DEFAULT JUDGMENT AGAINST DEFENDANTS**

Plaintiff Martin J. Walsh, Secretary of Labor, United States Department of Labor (“Secretary”), hereby requests this Court grant his Motion for Default Judgment against Defendants Halo Homecare Services, LLC (“HHCS”), Halo MGT Productions, LLC (“HMGT”), Sharon Ward, and Shana Norris (collectively, “Defendants”) pursuant to Fed. R. Civ. P. 55(b). The Declaration of Nikolai Bogomolov, Assistant District Director with the United States Department of Labor, Wage and Hour Division, is attached in support of the Secretary’s Motion.

WHEREFORE, Plaintiff moves this Court to enter a judgment of injunction against Defendants, permanently enjoining Defendants from violating the provisions of sections 6, 7, 11, and 15 of the Fair Labor Standards Act (29 U.S.C. § 201, *et seq.*).

FURTHER, Plaintiff moves this Court to make and enter a judgment against Defendants in the amount of \$768,229.48 representing unpaid minimum wage and overtime

compensation and liquidated damages due Defendants' employees for the period of July 14, 2017 through February 6, 2021.

Respectfully Submitted,

Dated: November 21, 2022

/s/ Adam M. Lubow
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